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BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

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ARIZONA CORPORATION COMMISSION

Nov 10 11 47 AM '98

JIM IRVIN

Commissioner/Chairman

RENZ D. JENNINGS

Commissioner

CARL J. KUNASEK

Commissioner

NOV 10 1998

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IN THE MATTER OF THE APPLICATION
OF TUCSON ELECTRIC POWER
COMPANY FOR APPROVAL OF ITS
PLAN FOR STRANDED COST
RECOVERY

DOCKET NO. E-01993A-98-0471✓

IN THE MATTER OF THE FILING OF
TUCSON ELECTRIC POWER COMPANY
OF UNBUNDLED TARIFFS PURSUANT
TO A.A.C. R14-2-1601 ET SEQ.

DOCKET NO. E-01993A-97-0772✓

IN THE MATTER OF COMPETITION IN
THE PROVISION OF ELECTRIC
SERVICES THROUGHOUT THE STATE
OF ARIZONA

DOCKET NO. RE-00000C-94-0165✓

IN THE MATTER OF THE APPLICATION
OF ARIZONA PUBLIC SERVICE
COMPANY FOR APPROVAL OF ITS
PLAN FOR STRANDED COST
RECOVERY

DOCKET NO. E-01345A-98-0473✓

IN THE MATTER OF THE FILING OF
ARIZONA PUBLIC SERVICE COMPANY
OF UNBUNDLED TARIFFS
PURSUANT TO A.A.C. R14-2-1601 ET SEQ.

DOCKET NO. E-01345A-97-0773

ARIZONA ELECTRIC POWER COOPERATIVE, INC.'S
RESPONSE TO STAFF'S REQUEST FOR PROCEDURAL ORDER

Arizona Electric Power Cooperative, Inc. ("AEPCO") and its counsel have only been able to receive in the past few hours a complete copy including the exhibits of the two Notices of Filing in these dockets. The Notices are wide ranging covering, among other things, the following:

- Unbundled Rates.
- Regulatory Asset Recovery.
- Stranded Cost Recovery.
- Divestiture.
- A statement that a Tucson Electric Power ("TEP") affiliated company known as Transco "will acquire all transmission facilities owned by TEP, APS, SRP, AEPCO and others..."
- A template for future transmission pricing policies.
- FERC transmission issues.
- ISA/ISO matters.
- Must run assets.
- Amendments to the Commission's Electric Competition Rules.
- Issues concerning the Commission's Integrated Resource Planning and Affiliated Rules.

All of these issues are complex. Their resolution will have major impacts on Arizona, generally, and AEPCO, its member distribution cooperatives and their customer/owners, specifically.

In light of this, Staff's suggestion that testimony/comments be filed by November 17, a hearing be held on November 20 and the Commission vote on these complex matters at the conclusion of the hearing without briefing is ludicrous. Apparently, Staff, TEP and APS have been discussing these matters for several months. To allow interested parties only a few days to analyze the results and formulate and present their positions is unfair, irrational and a clear violation of due process. Some of these concepts may have merit. But, on this suggested timetable, the parties, the Hearing Officer and the Commission will have no reasonable opportunity to ascertain that.

AEPCO would suggest that parties be given at least until December 1 to analyze this data and submit suggestions at that time for a more rational hearing schedule and procedure.

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2 RESPECTFULLY SUBMITTED this 10th day of November, 1998.

3 GALLAGHER & KENNEDY, P.A.
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5
6 By Michael M. Grant

7 Michael M. Grant
8 2600 North Central Avenue
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10 Attorneys for Arizona Electric Power
11 Cooperative, Inc.

12 Original and ten (10) copies
13 of the foregoing document filed
14 this 10 day of November, 1998, with:

15 Docket Control
16 Arizona Corporation Commission
17 1200 West Washington
18 Phoenix, Arizona 85007

19 Copy of the foregoing document
20 hand delivered this 10 day of
21 November, 1998, to:

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Jerry Rudibaugh, Esq.
Chief Hearing Officer
Hearing Division
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All parties in Docket Nos. E-01993A-98-0471,
E-01993A-97-0772, E-01345A-98-0473,
E-01345A-97-0773 and RE-00000C-94-0165,


#663061 v1 - Stranded Cost